# JOUJ W. HOHZOH KUUBE FRWY., #241, Las Vegas, INEVAUA 62032 Telephone: (702) 383-2864 Facsimile: (702) 383-0065

	LAGOMARSINO LAW
1	ANDRE M. LAGOMARSINO, ESQ. (#6711)
2	TAYLOR N. JORGENSEN, ÉSQ. (#16259) 3005 W. Horizon Ridge Pkwy., #241
	Henderson, Nevada 89052
3	Telephone: (702) 383-2864
4	Facsimile: (702) 383-0065 aml@lagomarsinolaw.com
5	taylor@lagomarsinolaw.com Attorneys for Plaintiff
6	UNITED STAT

# UNITED STATES DISTRICT COURT

### DISTRICT OF NEVADA

JUSTYN HORNOR, individually,

Plaintiff,

VS

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BRANDON WEY, individually; REFLEX MEDIA, INC, a Nevada Corporation; ROE ENTITIES I – V, inclusive,

Defendants.

CASE NO.: 2:22-cv-01840-RFB-DJA

STIPULATION AND ORDER TO EXTEND THE DEADLINES FOR PLAINTIFF'S OPPOSITION TO AND DEFENDANTS' REPLY IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS

Pursuant to LR 6-1, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend the deadline to file Plaintiff's Opposition to Defendants' Motion to Dismiss (ECF No. 12) in the above-captioned case for twenty-six (26) days, up to and including Monday, January 23, 2023.

The parties likewise agree to extend Defendants' deadline to file their subsequent Reply in Support of their Motion to Dismiss up to and including February 6, 2023.

This Request for an extension of time is not sought for any improper purpose or other purpose of delay. This request for extensions is based upon the following:

The Winter Holidays are quickly approaching, and both Plaintiff's and Defendants' counsel will have reduced availability;

Plaintiff's counsel is preparing for and conducting a full-day deposition on December 20, 2022;

Plaintiff's counsel is preparing for trial in the matter of *Kennedy t al. v. Las Vegas Sands Crop. Et al.* 2:17-cv-200880-APG-VCF and the Honorable Judge Gordon has instructed both

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Plaintiffs' and Defendants' counsel to give all the younger associate attorneys an active role in the	
trial;	
Immediately following the trial, Plaintiff's counsel will be preparing for and conducting and	
all-day deposition of an expert witness on January 16, 2023.	
Defendants' counsel will be occupied with depositions in another matter the week of and	

WHEREFORE, the parties respectfully request that this Court extend the time for Plaintiff to file his Opposition to Defendants' Motion to Dismiss (ECF No. 12) by twenty-six (26) days from the current deadline of December 28, 2022, up to and including January 23, 2023, and to extend the time for Defendants' to file their Reply in Support of their Motion to Dismiss up to and including February 6, 2023.

DATED this 20<sup>th</sup> day of December 2022

following the proposed February 6, 2023 deadline.

DATED this 20th day of December 2022

## /s/Taylor N. Jorgensen

### LAGOMARSINO LAW

Andre M. Lagomarsino, Esq. (#6711) Taylor N. Jorgensen, Esq. (#16259) 3005 W. Horizon Ridge Pkwy., #241 Henderson, Nevada 89052 Telephone: (702) 383-2864 Attorneys for Plaintiff Justyn Hornor

/s/ Jacob L. Fonnesbeck

## SF FIRM, LLP

Mark L. Smith, Esq. (#14762) Jacob L. Fonnesbeck, Esq. (#11961) 6345 S. Pecos Road, Suite 202 Las Vegas, Nevada 89120 Telephone: (725) 666-8701 Attorneys for Defendants Brandon Wey and Reflex Media, Inc.

# **ORDER**

IT IS SO ORDERED.

Dated this <sup>27t</sup>day of December 2022.

